

Mitchell Hackwood
Prime Clerk Claim No 106925

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re

PG&E CORPORATION,

and

PACIFIC GAS AND ELECTRIC COMPANY

Debtors.

Case No. 19-30088-DM

**MOTION TO ALLOW/DEEM TIMELY
LATE FILING OF MITCHELL P.
HACKWOOD**

Date: September 28, 2022

Time: 10am

Location: Via ZOOM

TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY COURT
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED
PARTIES:

I write to respectfully request the court would allow or deem timely my late claim as a Creditor in this action. I understand a claim may be deemed timely upon a showing of excusable neglect and lack of prejudice. Due to the incredibly stressful circumstances of losing every single one of my cherished possessions, nearly burning to death in the fire, the horribly distressing period afterward searching for housing and buying new clothes to cover my body, the disastrous and continuing consequences to my mental health, and then the trying times of the pandemic, I was not yet mentally prepared to relive my suffering experience and file my claim. Considering the modest settlement amount was already approved by the trust, there is no danger that Debtor could be prejudiced.

I narrowly escaped my home in Santa Rosa on the worst night of my life due to this fire. It was catastrophic to my well-being. I now only ask that the modest settlement amount, which was already offered and accepted in good faith, be honored by Debtor, without further complications or delays.

WHEREFORE, I, Mitchell Hackwood, pray for an order granting this Motion, finding that my Claim is allowed as having been timely filed, or other relief as the Court deems proper.

Dated: September 6, 2022.

By: s/ Mitchell P. Hackwood